WESTERN DISTRICT OF NEW TORK	
WESTERN DISTRICT OF NEW YORK	
UNITED STATES DISTRICT COURT	

KRISTEN KING

Plaintiff,

Index No. 1:19-cv-00077-GWC

v.

**NOTICE OF MOTION** 

ARAMARK SERVICES, INC.

Defendant.

PLEASE TAKE NOTICE that Plaintiff, Kristen King, by and through her attorneys, Greco Trapp, PLLC, hereby moves before the Hon. Geoffrey W. Crawford, Chief Judge at the United State Courthouse, 2 Niagara Square, Buffalo, New York on \_\_\_\_\_\_, 2020 at \_\_\_\_\_\_ a.m./p.m. for an Order compelling Defendant to respond fully to Plaintiff's First Request for Production of Documents Directed to Defendant and to Plaintiff's First Set of Interrogatories Directed to Defendant, an Order extending the deadlines set forth in the Court's Case Management Order, filed November 18, 2019, by holding them in abeyance until an order has been issued by this Court relative to Plaintiff's Motion to Compel, and then issuing a new Case Management Order, together with such other and further relief as the Court deems just, necessary, and proper. This motion is based upon all filings filed to date and is supported by the Declaration of Josephine A. Greco, Esq., dated October 20, 2020. Plaintiff intends to file Reply papers in further support of this motion.

DATED: October 20, 2020

Buffalo, New York

s/Josephine A. Greco
Josephine A. Greco, Esq.
Earl K. Cantwell, III, Esq.
Greco Trapp, PLLC
Attorneys for Plaintiff
1700 Rand Building
14 Lafayette Square
Buffalo, New York 14203
Tel: (716) 856-5800

E-mail: jgreco@grecolawyers.com

TO: Chelsea L. Conanan, Esq. 101 Park Avenue New York, New York 10178

> T: 212-309-6326 F: 212-309-6001

Email: <a href="mailto:chelsea.conanan@morganlewis.com">chelsea.conanan@morganlewis.com</a>

Patrick E. Fitzsimmons, Esq. The Guaranty Building 140 Pearl Street, Suite 100 Buffalo, New York 14202

T: 716-848-1710 F: 716-961-9965

Email: pfitzsim@hodgsonruss.com